

Meeting with Commissioner Pai

June 27, 2012

Introduction to ITTA

ITTA

- Mid-sized carriers
 - > 20 million access lines, 44 states
- Price cap and rate-of-return regulated
- Primarily rural service areas
- 85 percent broadband deployed



ITTA Member Companies





















ITTA Mission

- ITTA's mission is to advance the interests of its member companies before the FCC and Congress.
- This mission is focused on maintaining and evolving the underlying wireline networks of ITTA member companies, ensuring policymakers understand the relevancy of our companies for the communications future of the nation, and promoting policies that create opportunities for ITTA members to continue as successful communications providers going forward.



ITTA Advocacy

- Universal Service / Intercarrier
 Compensation Reform
- Access to Video Content
- VZ/SpectrumCo Transaction
- Special Access Reform



USF/ICC

- The FCC's policies must promote continued broadband investment, deployment, and adoption
- Available support must correspond to provider costs and regulatory obligations
- Reform of the USF contribution mechanism is critical



Video

- ITTA members require reasonable and nondiscriminatory access to video content
 - Retransmission Consent Reform
 - Program Access Reform
 - Video Accessibility



Verizon/SpectrumCo Transaction

- The Commission should closely evaluate all aspects of the transactions
 - The lack of transparency makes thorough review by interested parties impossible
 - The potential implications for competition by wireline providers are dramatic
 - Conditions to protect competition in the provision of video, wireline, special access, and other services may be appropriate



Special Access

- The Commission's analysis of the special access market should be data driven
 - Any data request should be directed to all providers
 - Mid-course changes to the special access rules absent data to support such changes is inappropriate

